

**STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT  
WHITE COUNTY, ILLINOIS**

JOHNNA D. SMITH,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	<del>XXXXXXXX</del>
	)	
DOUGLAS JERMAINE TURNER and	)	2022LA4
SMITH PACKAGE LLC dba	)	
SMITH TRANSPORTATION,	)	
	)	
Defendants.	)	

**COMPLAINT AND JURY DEMAND**

**COUNT I**

NOW COMES, the Plaintiff, JOHNNA D. SMITH, by her attorney, R COURTNEY HUGHES of the HUGHES LAW FIRM, and for Count I of her cause of action against the Defendant, DOUGLAS JERMAINE TURNER, states as follows:

1. On April 14, 2022, at approximately 7:40 a.m., the Plaintiff, JOHNNA D. SMITH, was driving her 2017 Nissan Rogue vehicle in a northbound direction along Illinois Route 1 near County Road 800N in White County, Illinois.

2. At said date, time and place, the Defendant, DOUGLAS JERMAINE TURNER, was driving a 2018 semi-tractor trailer truck in the scope of his employment for the Defendant, SMITH PACKAGE LLC dba SMITH TRANSPORTATION, in a southbound direction along Illinois Route 1 near County Road 800N in White County, Illinois.

3. At said date, time and place, the Defendant, DOUGLAS JERMAINE TURNER, drove his semi-tractor trailer truck across the center line of southbound Illinois Route 1 in White County, Illinois and struck the Plaintiff's vehicle in her northbound lane of traffic thereby



causing the Plaintiff's vehicle to spin and enter the southbound lane of Illinois Route 1 resulting in a head on crash between Plaintiff's car and a third vehicle.

4. Then and there the Defendant, DOUGLAS JERMAINE TURNER, committed one or more of the following negligent acts or omissions:

a. Drove his semi-tractor trailer truck across Illinois Route 1 without first ascertaining that such movement could be made with safety, in violation of 625 ICLS 5/11-709(a).

b. Drove his semi-tractor trailer truck at a speed that was greater than reasonable proper with regards to traffic conditions and the use of Illinois Route 1, and which endangered the safety of the Plaintiff, in violation of 625 ICLS 5/11-601(a).

c. Failed to keep his semi-tractor trailer truck he was driving in the southbound lane of Illinois Route 1 through the use of proper steering and braking.

5. As a direct and proximate result of one or more of the aforementioned negligent acts or omissions on the part of the Defendant, DOUGLAS JERMAINE TURNER, the Plaintiff, JOHNNNA D. SMITH, suffered one or more of the following injuries and damages:

- a. Past and future medical expenses.
- b. Past and future lost wages.
- c. Past and future disability.
- d. Past and future emotional distress.

WHEREFORE, the Plaintiff, JOHNNNA D. SMITH, prays for judgment against the Defendant, DOUGLAS JERMAINE TURNER, in an amount in excess of \$50,000.00, costs of suit, and DEMANDS TRIAL BY JURY OF SIX PERSONS.

By: s/R. Courtney Hughes

COUNT II

NOW COMES, the Plaintiff, JOHNNA D. SMITH, by her attorney, R COURTNEY HUGHES of the HUGHES LAW FIRM, and for Count II of her cause of action against the Defendant, SMITH PACKAGE LLC d/b/a SMITH TRANSPORTATION, states, in addition and in the alternative to the other count herein, as follows:

1 – 5. The Plaintiff restates and realleges paragraphs 1-5 of Count I, as and for, paragraphs 1-5 of Count II, inclusive.

WHEREFORE, the Plaintiff, JOHNNA D. SMITH, prays for judgment against the Defendant, SMITH PACKAGE LLC d/b/a SMITH TRANSPORTATION, in an amount in excess of \$50,000.00, costs of suit, and DEMANDS TRIAL BY JURY OF SIX PERSONS.

By: s/R. Courtney Hughes  
R. Courtney Hughes  
Illinois Bar No.: 6190301  
HUGHES LAW FIRM  
Attorneys at Law  
1317 W. Main St.  
P. O. Box 579  
Carbondale, IL 62903-0579  
Ph: 618-45-6985  
Fx: 618-549-0188  
Em: [rchughes@injury-laws.com](mailto:rchughes@injury-laws.com)

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AUG 05 2022

STATE OF ILLINOIS  
IN THE CIRCUIT COURT OF THE SECOND JUDICIAL CIRCUIT  
WHITE COUNTY, ILLINOIS

Friday  
Morning

JOHNNA D. SMITH,

Plaintiff,

vs.

No. 22-LA-4

DOUGLAS JERMAINE TURNER and  
SMITH PACKAGE LLC dba  
SMITH TRANSPORTATION,

Defendants.

ALIAS SUMMONS

To each defendant: Smith Package LLC, 409 Albert Street, Cape Girardeau, MO 63703

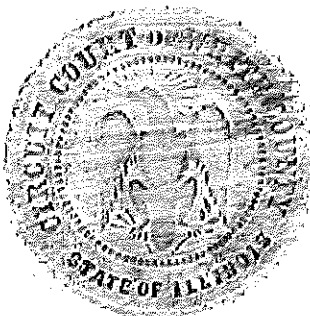
You are summoned and required to file an answer in this case, or otherwise file your appearance in the Office of the Clerk of this Court, IN THE COURT HOUSE BUILDING, room \_\_\_\_\_, Carmi, Illinois, within 30 days after service of this summons, not counting the day of service. IF YOU FAIL TO DO SO, A JUDGMENT OR DECREE BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <https://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp> or talk with your local circuit clerk's office.

To the officer:

This summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, summons shall be returned so indorsed.

This summons may not be served later than 30 days after its date.



Witness

7/28/2022

X20XXX

*Kerry L. Fulkerson*  
(Clerk of the Circuit Court)  
/s/ Hollie Damery

By: \_\_\_\_\_

(Deputy)

(Plaintiff's Attorney or Plaintiff if he is not represented by an Attorney)

Name: R. Courtney Hughes, Hughes Law Firm

Attorney for: Plaintiff

Address: 1317 West Main Street, PO Box 579

City: Carbondale, IL 62903-0579

Phone: (618) 457-6985

Fax: (618) 549-0188

email: rchughes@injury-laws.com

STATE OF MISSOURI; COUNTY OF CAPE GIRARDEAU

SHERIFF'S RETURN

I certify that I served/non-est this summons/subpoena in Cape Girardeau County, MO by:

☒ Delivering a copy of the summons/petition to respondent at his/her place of abode.

☐ Leaving it with a person over age 15 (name) \_\_\_\_\_

☐ His/Her place of employment \_\_\_\_\_

☐ Corporation-copy to (name) \_\_\_\_\_

☐ Title \_\_\_\_\_ Address \_\_\_\_\_

☐ Other \_\_\_\_\_

Served in Cape Girardeau County on this 14th day of August, 22 at 10:00  
date time

Ruth Ann Dickerson, Sheriff

By: \_\_\_\_\_

Holman 579  
Deputy Sheriff

Mileage (25): 15.63

Deputy Fee: 10.00

Service Fee: 20.00

Total: \$45.63 paid